

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

Crystal Long,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 8:17-cv-01955-GJH
	)	
Ability Recovery Services, LLC, et al.,	)	
	)	
Defendants.	)	

**Declaration in Support of Motion for Summary Judgment**

I, Morgan I. Marcus, hereby declare as follows:

1. I am an attorney granted leave to appear in this matter *pro hac vice*.
2. I am an attorney at the law firm of Sessions, Fishman, Nathan, and Israel, LLC, attorneys of record for Defendant Pendrick Capital Partners II, LLC (“Pendrick”).
3. I have personal knowledge of the matters set forth in this declaration. If called as a witness, I could testify competently to such matters.
4. Attached as Exhibit A to this Declaration is a true and correct copy of the Declaration of Anthony Albanese, Chief Compliance Officer for Pendrick, along with supporting exhibits.
5. Attached as Exhibit B to this Declaration is a true and correct copy of Crystal Long’s discovery responses dated November 29, 2017.
6. Attached as Exhibit C to this Declaration is a true and correct copy of Pendrick’s discovery responses dated February 16, 2018.
7. Attached as Exhibit D to this Declaration is a true and correct copy of the deposition of Crystal Long dated February 19, 2018.
8. Attached as Exhibit E to this Declaration is a true and correct copy of the deposition of Kim Nanfeldt, corporate representative for Ability Recovery Services, LLC.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 19<sup>th</sup> day of April, 2018, at Chicago, Illinois.

/s/Morgan I. Marcus

Morgan I. Marcus, Esq.

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*Admitted Pro Hac Vice*